

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

EDISON AUTOMOTIVE, INC.,)
Plaintiff,) CASE NO: 2:24-cv-1362
vs.) JUDGE:
ZURICH AMERICAN INSURANCE)
COMPANY OF ILLINOIS,)
Defendant.) **PETITION FOR REMOVAL**

**TO THE HONORABLE JUDGES OF THE UNITED STATES DISTRICT FOR
THE SOUTHERN DISTRICT OF OHIO:**

1. Zurich American Insurance Company of Illinois (“Zurich”) is a defendant in a civil action brought against it by Plaintiff Edison Automotive, Inc. (“Edison”) in the Court of Common Pleas for Franklin County, Ohio, styled *Edison Automotive, Inc. v. Zurich American Insurance Company of Illinois*, Case No. 24CV001271 on the docket of said Court. Pursuant to 28 U.S.C. § 1446(a), copies of all process and pleadings served in that action are attached hereto.
2. The action was commenced by filing of the Complaint on February 13, 2024.
3. Zurich was served via certified mail on February 27, 2024.
4. Edison is a corporation organized and existing under the laws of the State of Ohio, with its principal place of business in Columbus, Ohio.
5. Zurich is an Illinois corporation engaged in the insurance business with a statutory home office and its principal place of business is located at 1299 Zurich Way, Schaumburg, Illinois 60196. Zurich is authorized to transact business and has transacted business in Ohio.

6. The within lawsuit is a controversy between citizens of different states, as to give rise to complete diversity of citizenship within the meaning of 28 U.S.C. § 1332, and the provision of original jurisdiction in this Court.

7. As the Complaint seeks alleged unreimbursed loss amounts exceeding \$300,000, the matter in controversy exceeds the sum or value of \$75,000.00, exclusive of interest and costs.

WHEREFORE, Zurich hereby removes this action from the Court of Common Pleas for Franklin County, Ohio to this Court, pursuant to 28 U.S.C. § 1441.

Respectfully submitted,

/s/ *Crystal L. Maluchnik*

STEVEN G. JANIK (0021934)
CRYSTAL L. MALUCHNIK (0077875)
JANIK L.L.P.
P.O. Box 470550
Cleveland, Ohio 44147
(440) 838-7600 * (440) 838-7601 (fax)
steven.janik@janiklaw.com
crystal.maluchnik@janiklaw.com

Attorneys for Defendant Zurich American Insurance Company of Illinois

CERTIFICATE OF SERVICE

I hereby certify that on the 25th day of March, 2024, a copy of the foregoing was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system. In addition, a copy was served via electronic mail upon:

Stacy RC Berliner
Michael J. Class
Shumaker, Loop & Kendrick
121 South Main Street, Suite 575
Akron, Ohio 44308
sberliner@shumaker.com
mclass@shumaker.com

Attorneys for Plaintiff

/s/ Crystal L. Maluchnik

*One of the Attorneys for Defendant Zurich American
Insurance Company of Illinois*